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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
FOR DISTRICT OF NORTHERN CALIFORNIA

CHANG MIN LU AND LI FEN LEE, on behalf of themselves and all similarly situated others,

Plaintiffs,

vs.

PACIFIC RIM ENTERPRISES, FANNY KING, AND JIM SIEVERS

Defendants

Case No.: C09-6058 RMW

STIPULATION FOR EXTENSION OF TIME
RE: DISCOVERY AND MOTION DATES;
[] ORDER

Plaintiffs CHANG MIN LU and LI FEN LEE (collectively "Plaintiffs") and Defendants PACIFIC RIM ENTERPRISES, FANNY KING and JIM SIEVERS (collectively "Defendants") (Plaintiffs and Defendants hereinafter referred to collectively as "Parties"), through their respective counsel of record, hereby stipulate as follows:

1. This wage and hour case was filed on December 29, 2009.
2. The first Case Management Conference in this matter was held on July 30, 2010.
3. The Parties agreed to participate in the Court-sponsored mediation program.
4. On August 27, 2010, a neutral mediator was appointed for this case by the Court.
5. However, shortly thereafter, on September 21, 2010, the mediator withdrew. A replacement mediator was not appointed by the Court until on or about February 23, 2011.

Stipulation For Extension Of Time Re: Discovery And Motion Dates
[ORDER]

1 6. As result of these events, the Parties have not had the opportunity to explore the
2 settlement of this case through the use of mediation.

3 7. The Parties have been working together amicably and jointly desire to make all
4 efforts to attempt to resolve this matter through mediation. As part of this joint effort, the Parties
5 have agreed that it would be in their best interests to have a brief extension of time to complete
6 the discovery process and any motions in connection with this matter.

7 8. The assigned mediator has offered the Parties possible mediation dates in the first
8 and second week of April, 2011.

9 9. The Parties request only a brief extension of time as it relates to discovery dates,
10 which will not cause prejudice to any party. The only court date that will be impacted by this
11 request is the date to hear dispositive motions, which the parties request be moved by two (2)
12 weeks.

13 10. As such, the Parties hereby jointly request that the Court extend the time to
14 complete the discovery and motion dates as follows:

- 15 a. Discovery Cutoff – June 3, 2011
- 16 b. Expert Witness Disclosure – July 1, 2011
- 17 c. Disclosure of Rebuttal Experts – July 22, 2011
- 18 d. Expert Discovery Cutoff – August 1, 2011
- 19 e. Last day to hear Dispositive Motions – August 12, 2011

20 11. All other dates will remain on calendar as scheduled, including:

- 21 f. Joint Pretrial Statement - August 26, 2011
- 22 g. Pretrial Conference - September 1, 2011 at 2:00 pm
- 23 h. Jury Trial - September 12, 2001 at 1:30 pm

1 Dated: March 14, 2011

LAW OFFICE OF ADAM WANG

2 By: /s/ Adam Wang

3 ADAM WANG

Attorneys for Plaintiffs

5 Dated: March 14, 2011

KASTNER KIM LLP

6 By: /s/ L. Robin Gonzalez

7 L. Robin Gonzalez

Attorneys for Defendants

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Stipulation For Extension Of Time Re: Discovery And Motion Dates
[ORDER]

{ } **ORDER**

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that pursuant to the Parties' stipulation, the discovery dates and motion dates are continued as follows:

- a. Discovery Cutoff – June 3, 2011
- b. Expert Witness Disclosure – July 1, 2011
- c. Disclosure of Rebuttal Experts – July 22, 2011
- d. Expert Discovery Cutoff – August 1, 2011
- e. Last day to hear Dispositive Motions – August 12, 2011

All other dates will remain on calendar as scheduled, including:

- f. Joint Pretrial Statement - August 26, 2011
- g. Pretrial Conference - September 1, 2011 at 2:00 pm
- h. Jury Trial - September 12, 2001 at 1:30 pm

IT IS SO ORDERED

Dated: 3/29/11



Hon. Ronald M. Whyte